

**IN THE UNITED STATES BANKRUPTCY COURT
WESTERN DISTRICT OF ARKANSAS
HOT SPRINGS DIVISION**

**IN RE: JASON BLANKENSHIP AND
JENNIFER BLANKENSHIP
DEBTORS**

**CASE NO.: 6:23-bk-70672
CHAPTER 13**

**RESPONSE TO MOTION FOR RELIEF FROM THE AUTOMATIC STAY WITH
NOTICE OF OPPORTUNITY TO OBJECT**

Comes now the debtors/respondents, Jason Blankenship and Jennifer Blankenship, by and through their attorneys, Honey Law Firm, P.A., and for their Response to Motion for Relief from the Automatic Stay with Notice of Opportunity to Object (Doc. #94) (“Motion”) filed by Arvest Bank (“Creditor”), respectfully states as follows:

1. Debtors admit this this Court has jurisdiction over the subject matter and the parties as alleged within paragraph 1 of the Motion.
2. Debtors admit the allegations contained within paragraph 2 of the Motion.
3. Debtors admit the allegations contained within paragraph 3 of the Motion.
4. Debtors admit the allegations contained within paragraph 4 of the Motion.
5. Debtors admit the allegations contained within paragraph 5 of the Motion.
6. Debtors admit the allegation contained within paragraph 6 of the Motion.
7. Debtors admit the allegation contained within paragraph 7 of the Motion.
8. Debtors deny the allegations contained within paragraph 8 of the Motion.
9. Debtors admit the allegations contained within paragraph 9 of the Motion.
10. Debtors admit the allegations contained within paragraph 10 of the Motion.
11. Debtors deny the allegations contained within paragraph 11 of the Motion.
12. Debtors deny the allegation contained within paragraph 12 of the Motion.

13. Debtors deny the allegations contained within paragraph 13 of the Motion.
14. Debtors deny the allegations contained within paragraph 14 of the Motion.
15. Debtors deny that the described transaction constitutes a fraudulent conveyance or preference as alleged within paragraph 15 of the Motion.
16. Debtors admit the allegations contained within paragraph 16 of the Motion.
17. Debtors deny the allegations contained within paragraph 17 of the Motion.
18. Debtors deny the allegations contained within paragraph 18 of the Motion.
19. Debtors acknowledge the statements contained within paragraph 19 of the Motion.
20. Debtors deny all allegations not specifically admitted herein and reserve the right to amend this Response as necessary.

WHEREFORE, debtors/respondents, Jason and Jennifer Blankenship, pray that the Motion for Relief be denied and dismissed, and for all other just and proper relief to which the debtors may be entitled.

Respectfully Submitted,

HONEY LAW FIRM, P.A.
P.O. BOX 1254
HOT SPRINGS, AR 71902
(501)321-1007 Phone
(877)697-1777 Fax
mhoney@honeylawfirm.com

/s/Marc Honey
Marc Honey (86091)

CERTIFICATE OF SERVICE

I, the undersigned attorney, certify that a copy of the foregoing document was served on Jack W. Gooding, Chapter 13 Trustee, by ECF on May 17, 2024, and via electronic notice and/or U.S. Mail to the following:

Branch T. Fields
11300 Cantrell Road, Suite 201
Little Rock, AR 72212

/s/Marc Honey
Marc Honey (86091)